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March 16, 2018

VIA ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, New York 10007
Parker_NYSDChambers@nysd.uscourts.gov

Application Granted. The Court finds that movants have satisfied the requirements for sealing under *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110 (2d Cir. 2006) and *Bernstein v. Bernstein Litowitz Berger & Grossman LLP*, 814 F.3d 132 (2d Cir. 2016).

APPLICATION GRANTED

Kathauu H Palcy Hon. Katharine H. Parker, U.S.M.J.

3/23/2018

Re: <u>City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.</u> Case No. 15-Civ. 5345 AJN KHP

Dear Judge Parker:

I represent non-parties Gennady and Elena Petelin and respectfully request that the Court accept for filing under seal the enclosed letter motion regarding Wells Fargo's compliance with the Court's Order (ECF No. 560) on a motion by the Plaintiffs City of Almaty and BTA Bank JSC (the "Kazakh Entities") to compel Wells Fargo to produce unredacted bank records for the Petelins. (ECF No. 546). I solicited the parties for objections to sealing and received none.

As required by Paragraphs I(a) and III(d) of the Court's February 7, 2018 Individual Practices in Civil Cases, the accompanying e-mail includes the letter response with the exhibit to be filed under seal and version of the letter response and the exhibit to be filed publicly with highlights reflecting the proposed redactions.

The Petelins respectfully request sealing of the letter response and exhibit to their letter response because it contains private information pertaining to the Petelins' personal finances that paints a picture of the Petelins' spending and/or investing habits and thus warrants protection under the November 30, 2016 Protective Order.

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Accordingly, the Petelins respectfully ask the Court to allow that the letter response and exhibit to their letter response be filed under seal.

Respectfully Submitted,

Eugene Illovsky